## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
W. R. GRACE & CO., <u>et al.</u> , <sup>1</sup>	) )	Case No. 01-1139 (KG) Jointly Administered
Reorganized Debtors.	)	•
	·	Objection Deadline: March 24, 2017 at 4:00 p.m. Hearing Date: May 3, 2017, at 11:00 a.m.

CERTIFICATION OF NO OBJECTION REGARDING MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE REORGANIZED DEBTORS TO EXCEED THE PAGE LIMIT REQUIREMENT FOR OMNIBUS MEMORANDUM IN SUPPORT OF GRANTING THE REORGANIZED DEBTORS' SUMMARY JUDGMENT MOTION, DENYING NORFOLK SOUTHERN'S CROSS-MOTION AND DISALLOWING NORFOLK SOUTHERN'S INDEMNIFICATION CLAIM [DOCKET NO. 32840]

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the *Motion for Entry of an Order Authorizing* the Reorganized Debtors to Exceed the Page Limit Requirement for Omnibus Memorandum in Support of Granting the Reorganized Debtors' Summary Judgment Motion, Denying Norfolk Southern's Cross-Motion and Disallowing Norfolk Southern's Indemnification Claim [Docket No. 32840] (the "Motion") filed on March 13, 2017. The undersigned further certifies that he has caused the Court's docket in this case to be reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion for Entry of an Order Authorizing the Reorganized Debtors to Exceed the Page Limit Requirement for Omnibus Memorandum in Support of Granting the Reorganized Debtors' Summary Judgment

<sup>&</sup>lt;sup>1</sup> The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "<u>Grace</u>") and W. R. Grace & Co.-Conn. ("<u>Grace-Conn.</u>").

Motion, Denying Norfolk Southern's Cross-Motion and Disallowing Norfolk Southern's Indemnification Claim [Docket No. 32839] (the "Notice") filed on March 10, 2017, responses to the Motion were to be filed and served no later than March 24, 2017 at 4:00 p.m.

It is hereby respectfully requested that the Order attached hereto as <u>Exhibit A</u> be entered at the Court's earliest convenience.

Dated: April 27, 2017

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## /s/ James E. O'Neill

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